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From: Vaughn, Stephanie
Sent: Fri 6/14/2013 6:22:00 PM
Subject: Draft PAMP, follow-up comments....

Hi Rob,

EPA has reviewed the responses provided on June 11, 2013 to EPA and NJDEP comments on the draft Perimeter Air Monitoring Plan. We still have the following comments/ recommendations, all but the first of which were discussed during our conference call yesterday:

1. Any comments provided on 6/12/13 supplement and, where appropriate, supersede previously submitted comments on the same section (for example, those related to Tables 4-1 and 4-2).

2. As discussed, please provide a more detailed/clearer description of the locations of the air monitoring stations and how they will be utilized. After discussion with Mike Hoppe, it seems we are in agreement with your proposed approach, but the current document does not make that clear.

3. As we discussed, Table 3-1 states that EPA Methods TO-9A and TO-4A will be used to analyze air samples for 2,3,7,8-TCDD and Total PCBs. The table is titled "COPC Particulate Sampling and Analysis Approach." However, these methods quantify concentrations of both the particulate and gaseous forms of these contaminants. Please confirm that these methods will be used in their full form and modify the text of this table/section to make this clear (i.e., that both the particulate and gaseous phase concentrations will be reported).

4. In response to the CPG's response to NJDEP Comment 7, we offer the following modified approach, which was discussed yesterday:

a. Week 1 (days 1 through 6 of dredging) – daily 24-hour samples for dioxin, PCBs, mercury

and PM10 → 6 days x 4 samples/day x 3 locations = 72 samples

b. Week 2 of dredging – 24-hour samples for dioxin and PCBs during two days (say, Tuesday and Thursday) → 2 days x 2 samples/day x 3 locations = 12 samples

c. Specify rapid turnaround for these samples.

d. After this start-up monitoring, and until results are received, follow the rotating schedule for COPC sampling outlined in the draft PAM plan (i.e., PM10 and Mercury, TCDD, PCBs, Mercury, repeat). Note that, assuming at least the 5-day turnaround time specified in the RTC is achieved, this interim sampling may not be needed.

e. Adjust the COPC sampling frequency once the results are reviewed. Based on existing data and the details of the dredging operation, we anticipate that the frequency of COPC sampling will be able to be decreased to 1 time/week.

f. When the dredging operations reach the region of 28+00 to 21+00, conduct another intensive COPC air sampling monitoring program. This is the region with the highest concentrations of COPCs in both the top 2 feet and in the underlying sediment. The length of this intensive sampling (anywhere from 2 to 6 days) will depend on the previous results, and results from this round may affect the regular COPC monitoring frequency moving forward.

5. Please provide more details on how both the real time and non-real time results will be reported, both to the project team and to the public.

We look forward to seeing your responses to the additional comments sent earlier this week, as well as these requests for further clarification. Please let me know when the pre-dredging baseline monitoring is scheduled to begin.

Thanks,

Stephanie